

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE**

CROSSPOINT CHURCH,

Plaintiff,

v.

A. PENDER MAKIN, in her official capacity as
Commissioner of the Maine Department of
Education, and JEFFERSON ASHBY, EDWARD
DAVID, JULIE ANN O'BRIEN, MARK
WALKER, and THOMAS DOUGLAS, in their
official capacities as Commissioners of the Maine
Human Rights Commission.

Defendants.

Civil Action No. 23-cv-00146-JAW

JOINT MOTION TO EXTEND DISCOVERY DEADLINES

On March 27, 2023, Plaintiffs filed a complaint (Dkt. 1) and Motion for Preliminary Injunction (Dkt. 5) challenging the current statutory framework governing participation of religious schools in Maine's tuitioning program. On September 14, 2023, this Court granted the parties' joint motion to amend the scheduling order (Dkt. 33). Under the amended scheduling order, the deadline to make a written settlement demand, complete discovery, and other related deadlines are quickly approaching. They are as follows:

- Deadline to Make a Written Settlement Demand on Defendants: **November 17, 2023**
- Deadline to Complete Discovery: **December 1, 2023**

- Deadline to file Notice of Intent to file Motion for Summary Judgment and Need for a Pre-Filing Conference Pursuant to Local Rule 56(h): **December 8, 2023**
- Deadline for Filing of All Dispositive Motions and All Daubert and Kumho Motions Challenging Expert Witnesses with Supporting Memoranda: **December 22, 2023**
- Expected Trial Date: **March 5, 2024**

Plaintiff's Motion for Preliminary Injunction is still pending, and the Court's resolution of that motion will directly affect discovery and related proceedings in this case. It would thus promote interests of efficiency to extend these deadlines by an additional 60 days. This Court may extend a deadline "if a request is made[] before the original time or its extension expires." Fed. R. Civ. P. 6(b)(1)(A).

CONCLUSION

The Court should grant this motion and extend all remaining deadlines listed in the amended scheduling order (Dkt. 33) by 60 days.

Dated: November 17, 2023

s/Christopher C. Taub
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Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

I certify that this motion complies with the length and typeface requirements of Local Rule 7(d).

Dated: November 17, 2023

/s/Christopher C. Taub
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CERTIFICATE OF SERVICE

I certify that, on November 17, 2023, I electronically filed the foregoing with the Court and served it on opposing counsel through the Court's CM/ECF system.

Respectfully submitted,

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